REMARKS

The Applicants have carefully considered the Final Office Action dated April 21, 2008, and the references applied therein. In the official action, claims 1-7, 9-17, 19-27, and 29-32 were rejected under 35 U.S.C. § 103(a) as unpatentable over Compaq Computer Corporation, Hewlett-Packard Company, IBM Corporation, Intel corporation and Microsoft Corporation (CHIIM) in view of Kuznetsov et al. Claims 8, 18, and 28 were rejected under 35 U.S.C. 103(a) as unpatentable over CHIIM in view of Kuznetsov et al. and further in view of McDonnal et al. By way of this response, the Applicants respectfully traverse the rejections and submit that all pending claims are in condition for allowance. Reconsideration of this application is respectfully requested.

I. Examiner Interview Summary

As an initial matter, the Applicants would like to thank Examiner Shiferaw for granting an interview with the Applicants' representative on June 18, 2008. During the interview, Examiner Shiferaw and Applicants' representative, Felipe Hernandez, discussed claim 1. More specifically, the Applicants' representative clarified that the descriptors recited in claim 1 are protection policy descriptors. Such a reading of descriptors follows from the language of claim 1 reciting, "wherein each of the descriptors is indicative of a corresponding protection policy for its one of the memory ranges." For clarification purposes, the Applicants' representative proposed amending claim 1 to recite protection policy descriptors.

II. Claim Amendments

By way of this response, the Applicants have amended claims 1, 3, 5, 11, 13, 15, 21, 23, 24, 26, and 31 to clarify that the descriptors recited in the pending claims are protection policy descriptors. The Applicants respectfully submit that such amendments do not introduce new matter. Further, the amendments do not introduce additional limitations necessitating a new search. Instead, the amendments are for clarification purposes to clarify the language previously recited in the independent claims, "wherein each of the descriptors is indicative of a corresponding protection policy for its one of the memory ranges." Further, the protection policy descriptors language is supported by the Applicants' written description at paragraph [0023]. *See Applicants' Specification*, ¶ [0023] ("In one example, the resource protection list 108 may be a concatenation of <u>protection descriptors</u> that are generated by the pre-boot firmware 102. Each <u>protection descriptor</u> may include a memory address range (i.e., memory address boundaries) and a <u>protection description</u> for a respective one of the protected firmware resources 106.") (emphasis added).

III. Independent Claim 1

The Applicants respectfully submit that independent claim 1 is allowable over the art of record. Independent claim 1 is directed to a method involving, *inter alia*, storing a plurality of protection policy descriptors in a resource protection list, wherein each of the protection policy descriptors is indicative of a protection policy for its one of the memory ranges. The Applicants respectfully submit that neither CHIIM nor Kuznetsov et al. describe or suggest storing a plurality of protection policy descriptors in a resource protection list, wherein each of the protection policy descriptors is indicative of a protection policy for its one of the memory ranges. Thus, combining CHIIM and Kuznetsov et al. would not result in showing each and every element of the claimed invention. In addition, one would not modify CHIIM in light of Kuznetsov et al. to create a plurality of protection policy descriptors stored in a resource protection list, wherein each of the protection policy descriptors is indicative of a protection policy for its one of the memory ranges. Therefore, CHIIM and Kuznetsov et al. do not render claim 1 *prima facie* obvious.

As stated in the Office action, Kuznetsov et al. describe a "hardware module and protection software." *Final Office action dated April 21, 2008*, p. 2, § 2. Specifically, Kuznetsov et al. describe redirecting requests to one of three request check programs (58, 60, and 62) by replacing addresses in an interrupt vector table (IVT). *Kuznetsov et al.*, 6:27-47. However, the IVT does not store protection policy descriptors indicative of protection policies for their memory ranges as recited in claim 1. Instead, Kuznetsov et al. describe that it is the request check programs (58, 60, and 62) that are responsible for determining whether requests are dangerous requests. *Id.*, 7:9-60. Thus, dangerous requests are identified by execution of the software forming the request check programs (58, 60, and 62). *Id.* It is well known that software can be programmed to perform different operations (e.g., deny dangerous requests) based on programmed conditional tests (i.e., without the need of a separate test condition table such as a resource protection list). Therefore, Kuznetsov et al. do not describe storing protection policy descriptors in a resource protection list as recited in claim 1.

CHIIM does not overcome the deficiency of Kuznetsov et al. Instead, CHIIM describes a root system description table (RSDT), an advanced control power interface (ACPI) table, a fixed ACPI description table (FACP), and a differentiated system description table (DSDT). *CHIIM*, Figure 7-1. However, CHIIM does not describe that any of the RSDT, the FACP, the DSDT, or the ACPI table store protection policy descriptors indicative of protection policies for their memory ranges. The protection policy descriptors recited in claim 1 are described by way of example in the Applicants' written description as follows.

> Each protection descriptor may include a memory address range (i.e., memory address boundaries) and a protection description for a respective one of the protected firmware resources 106. For example, if one of the protected firmware resources 106 includes firmware code, a protection descriptor may be generated to designate the resource as "execute-only," thus inhibiting the resource from being overwritten. In another example, one of the protected firmware resources 106 may include a firmware data resource that is designated by a protection descriptor as "read-only by firmware code", thus preventing any code other than firmware code from reading the firmware data resource. *See Applicants' Specification*, ¶ [0023].

CHIIM does not describe that such protection policy descriptors are stored in any of the RSDT, the FACP, the DSDT, or the ACPI table.

Further, one would not be motivated to modify CHIIM to store protection policy descriptors in a list or table in view of Kuznetsov et al. because Kuznetsov et al. describe programming software to test for dangerous conditions, but Kuznetsov et al. do not describe storing protection policy descriptors in a list or table. That is, the request check programs (58, 60, and 62) of Kuznetsov et al. are already programmed to identify dangerous requests and, thus, there would be no need to have a separate table (such as one of the RSDT, the FACP, the DSDT, or the ACPI table) to store the types of protection policy descriptors recited in claim 1.

Further, the IVT described by Kuznetsov et al. stores addresses to pass control to the different request check programs (58, 60, and 62), and, as discussed above, such addresses do not constitute the types of protection policy descriptors recited in claim 1. Therefore, combining CHIIM and Kuznetsov et al. by storing the addresses from the IVT described by Kuznetsov et al. in one of the RSDT, the FACP, the DSDT, or the ACPI table described by CHIIM would not result in storing a plurality of protection policy descriptors in a resource protection list, wherein each of the descriptors is indicative of a protection policy for its one of the memory ranges as recited in claim 1.

In view of the foregoing, the Applicants respectfully submit that CHIIM and Kuznetsov et al. cannot render claim 1 *prima facie* obvious. Accordingly, the Applicants respectfully submit that independent claim 1 and all claims dependent thereon are in condition for allowance.

IV. Independent Claim 11

The Applicants respectfully submit that independent claim 11 is allowable over the art of record. Independent claim 11 is directed to an apparatus and recites, *inter alia*, a processor system to store descriptors in a resource protection list, wherein each of the descriptors is indicative of a protection policy for its one of the memory ranges. For at least the reasons discussed above in connection with claim 1, the Applicants respectfully submit that CHIIM and Kuznetsov et al. do not render claim 11 *prima facie* obvious because the suggested combination would not result in storing a plurality of protection policy descriptors in a resource protection list, wherein each of the protection policy descriptors is indicative of a protection policy for its one of the memory ranges. Accordingly, the Applicants respectfully submit that independent claim 11 and all claims dependent thereon are in condition for allowance.

V. Independent Claim 21

The Applicants respectfully submit that independent claim 21 is allowable over the art of record. Independent claim 21 is directed to a computer readable medium and recites, *inter alia*, instructions that, when executed, cause a machine to store descriptors in a resource protection list, wherein each of the descriptors is indicative of a protection policy for its one of the memory ranges. For at least the reasons discussed above in connection with claim 1, the Applicants respectfully submit that CHIIM and Kuznetsov et al. do not render claim 21 *prima facie* obvious because the suggested combination would not result in storing a plurality of protection policy descriptors in a resource protection list, wherein each of the protection policy descriptors is indicative of a protection policy for its one of the memory ranges. Accordingly, the Applicants respectfully submit that independent claim 21 and all claims dependent thereon are in condition for allowance.

VI. Independent Claim 31

The Applicants respectfully submit that independent claim 31 is allowable over the art of record. Independent claim 31 is directed to an apparatus and recites, *inter alia*, a processor system to store descriptors in a resource protection list, wherein each of the descriptors is indicative of a protection policy for its one of the memory ranges. For at least the reasons discussed above in connection with claim 1, the Applicants respectfully submit that CHIIM and Kuznetsov et al. do not render claim 31 *prima facie* obvious because the suggested combination would not result in storing a plurality of protection policy descriptors in a resource protection list, wherein each of the protection policy descriptors is indicative of a protection policy for its one of the memory ranges. Accordingly, the Applicants respectfully submit that independent claim 31 and all claims dependent thereon are in condition for allowance.

VII. Conclusion

In view of the foregoing, the Applicants respectfully submit that this application is in condition for allowance. The Commissioner is hereby authorized to charge any fees which may be required during the pendency of this application under 37 CFR 1.16 or 1.17 to Deposit Account No. 50-2455. If there are any remaining matters that the Examiner would like to discuss, the Examiner is invited to contact the undersigned representative at the telephone number set forth below.

Respectfully submitted,

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